

Facility Name: **Conner Holdings, LLC**

City: Homerville

County: Clinch

AIRS #: 04-13-065-00016

Application #: TV-704618

Date SIP Application Received: October 31, 2022

Date Title V Application Received: October 31, 2022

Permit No: 2421-065-0016-V-02-1

Program	Review Engineers	Review Managers
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TOXICS	n/a	n/a
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Introduction

This narrative is being provided to assist the reader in understanding the content of the referenced SIP permit to construct and draft operating permit amendment. Complex issues and unusual items are explained in simpler terms and/or greater detail than is sometimes possible in the actual permit. This permit is being issued pursuant to: (1) Sections 391-3-1-.03(1) and 391-3-1-.03(10) of the Georgia Rules for Air Quality Control, (2) Part 70 of Chapter I of Title 40 of the Code of Federal Regulations, and (3) Title V of the Clean Air Act Amendments of 1990. The following narrative is designed to accompany the draft permit and is presented in the same general order as the permit. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Any revisions made to the permit in response to comments received during the public comment period and EPA review process will be described in an addendum to this narrative.

I. Facility Description**A. Existing Permits**

Table 1 below lists the current Title V permit, and all administrative amendments, minor and significant modifications to that permit, and 502(b)(10) attachments.

Table 1: Current Title V Permit and Amendments

Permit/Amendment Number	Date of Issuance	Description
2421-065-0016-V-02-0	16-Feb-2022	Initial Title V permit

B. Regulatory Status**1. PSD/NSR/RACT**

Conner Holdings, LLC (“hereinafter “facility”) is located in Clinch County, which is in attainment for all criteria pollutants. The potential emissions of all PSD pollutants are less than their respective PSD major source thresholds. The PSD major source threshold is 250 tons per year (tpy) because the site is not one of the listed 28 source categories under PSD/NSR regulations. Emissions of each PSD regulated pollutant is less than 250 tpy so the site is a minor source with respect to PSD regulations.

Since Clinch County is an attainment area for all criteria pollutants, non-attainment area new source review (NAA NSR) is not applicable.

Since Clinch County is not in the county list of GA Rule (tt), no VOC RACT is required for the facility.

2. Title V Major Source Status by Pollutant**Table 2: Title V Major Source Status**

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility’s Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM ₁₀	✓			✓
PM _{2.5}	✓			✓
SO ₂	✓			✓
VOC	✓	✓		
NO _x	✓			✓
CO	✓			✓
TRS	n/a			
H ₂ S	n/a			
Individual HAP	✓			✓

TITLE V SIGNIFICANT MODIFICATION (WITHOUT CONSTRUCTION) APPLICATION REVIEW

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the Pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
Total HAPs	✓			✓
Total GHG	✓			✓

II. Proposed Modification

A. Description of Modification

Currently, Sawmill Cyclone 1 (SCY1) is permitted as a control device for emissions from Sawmill Chipper 1 (SCH1). This permit application proposes that SCY1 should not be permitted as a mandatory control device for SCH1; the differential pressure monitoring requirements for SCY1 should be removed; and the weekly operation and maintenance checks for SCY1 should be removed.

B. Emissions Change

Currently, Sawmill Cyclone 1 (ID No. SCY1) is permitted as a mandatory control device for emissions from Sawmill Chipper 1 (ID No. SCH1). The facility submitted Application No. TV-704618 and requested that SCY1 should not be permitted as a mandatory control device for SCH1. SCH1 is only subject to the GA Rule (b) visible emission limit and GA Rule (e) PM emission limit, and is able to comply without using the sawmill cyclone. SCY1 is used to collect the wood chips and sawdust from SCH1 and deliver them to the sawmill screener (ID No. SSC1). The potential particulate matter (PM) emissions from SCH1 were calculated without considering the control efficiency of SCY1; and Conner Holdings, LLC (hereinafter "facility") is still a minor source for PM under Title V of 1990 CAAA.

The facility requested that the differential pressure monitoring requirements for SCY1 should be removed; and the weekly operation and maintenance checks for SCY1 should be removed. No additional emissions would be caused by this modification.

Table 3: Emissions Change Due to Modification

Pollutant	Is the Pollutant Emitted?	Net Actual Emissions Increase (Decrease) (tpy)	Net Potential Emissions Increase (Decrease) (tpy)
PM	✓	0	0
PM ₁₀	✓	0	0
PM _{2.5}	✓	0	0
SO ₂	✓	0	0
VOC	✓	0	0
NO _x	✓	0	0
CO	✓	0	0
TRS	n/a		
H ₂ S	n/a		
Individual HAP	✓	0	0
Total HAPs	✓	0	0
Total GHG	✓	0	0

C. PSD/NSR Applicability

Since the modification is not expected to cause any emission increases, the modification will not trigger the PSD/NSR review. The facility will still be a Minor Source under PSD.

III. Regulated Equipment Requirements**A. Brief Process Description**

Conner Holdings, LLC produces kiln-dried dimensioned lumber from pine logs. The facility consists of a sawmill (ID No. SM01), a planer mill (ID No. PM01), a bag plant (ID No. BP01) for bark, associated debarking, chipping, and screening equipment, and a continuous dry kiln (ID No. DK01).

B. Equipment List for the Process

Emission Units		Applicable Requirements/Standards	Air Pollution Control Devices	
ID No.	Description		ID No.	Description
DB01	The debarker removes bark from pine logs	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
SM01	The sawmill cuts debarked pine logs into rough-sawn lumber	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
DK01	Dry Kiln 1, continuous dry kiln with 100 MMBF/yr lumber drying capacity and 40 MMBtu/hr burner	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i) 391-3-1-.02(2)(g)	n/a	n/a
PM01	The planer mill cuts kiln-dried lumber into dimensional lumber	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
BP01	Bag plant for screening and bagging bark	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
SCH1	SCH1 processes wood scrap from the sawmill into wood chips and sawdust.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	SCY1	Cyclone
SCH2	SCH2 processes wood scrap from the sawmill into wood chips and sawdust.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
SSC1	SSC1 separates wood chips and sawdust from the sawmill, SCH1, and SCH2.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	n/a	n/a
PCH1	PCH1 processes wood scrap from the planer mill into shavings.	391-3-1-.02(2)(b)1. 391-3-1-.02(2)(e)1.(i)	PCY1	Cyclone

* Generally applicable requirements contained in this permit may also apply to emission units listed above. The lists of applicable requirements/standards are intended as a compliance tool and may not be definitive.

D. Permit Conditions

Condition 3.5.1 has been modified to remove Cyclone SCY1 from the operating condition.

IV. Monitoring Requirements (with Associated Record Keeping and Reporting)

Conditions 5.2.1 and 5.2.2 have been modified to remove Cyclone SCY1 from the monitoring conditions.

V. Other Record Keeping and Reporting Requirements

Condition 6.1.7c.iii has been modified to remove Cyclone SCY1 from the reporting and recordkeeping condition.

Addendum to Narrative

The 30-day public review started on month day, year and ended on month day, year. Comments were/were not received by the Division.

//If comments were received, state the commenter, the date the comments were received in the above paragraph. All explanations of any changes should be addressed below.//